

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

WOLLMUTH MAHER & DEUTSCH LLP

Paul R. DeFilippo, Esq.
500 Fifth Avenue
New York, New York 10110
Telephone: (212) 382-3300
Facsimile: (212) 382-0050
pdefilippo@wmd-law.com

JONES DAY

Gregory M. Gordon, Esq.
Brad B. Erens, Esq.
Dan B. Prieto, Esq.
Amanda Rush, Esq.
2727 N. Harwood Street
Dallas, Texas 75201
Telephone: (214) 220-3939
Facsimile: (214) 969-5100
gmgordon@jonesday.com
bberens@jonesday.com
dbprieto@jonesday.com
asrush@jonesday.com
(Admitted *pro hac vice*)

ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

APPLICATION FOR ORDER SHORTENING TIME

TO: THE HONORABLE MICHAEL B. KAPLAN
CHIEF UNITED STATES BANKRUPTCY JUDGE

The above-captioned debtor (the “Debtor”), by and through its undersigned counsel,
requests that the time period to notice a hearing on the *Debtor’s Motion for Entry of an Order
Authorizing the Debtor to (I) File an Unredacted Version of Its Sur-Reply Under Seal; Submit*

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

Certain Confidential Exhibits to the Same Under Seal; and Granting Related Relief (the “Motion to Seal”)² as required by D.N.J. LBR 9013-2(a) be shortened pursuant to Fed. R. Bankr.

P. 9006(c)(1), for the reasons set forth below:

1. A shortened hearing time is requested because: The trial on the various motions to dismiss the Debtor’s chapter 11 case and related joinders [Dkts. 286, 335, 346, 350, 352, 358, 379, 384, 473 and 480] (collectively, the “Motions to Dismiss”) is scheduled to begin on June 27, 2023. Contemporaneously herewith, the Debtor has filed a redacted version of the *Debtor’s Sur-Reply in Further Support of Omnibus Objection to Motions to Dismiss Chapter 11 Case* (the “Sur-Reply”) in opposition to the Motions to Dismiss, and its Motion to Seal certain redacted portions of the Sur-Reply and the accompanying exhibits that have been designated as “Confidential Information” as defined in the *Order Governing Confidential Information By and Between the Official Committee of Talc Claimants and the Debtor Pursuant to D.N.J. LBR 9021-1(b)* [Dkt. 545]. As a practical matter, the Motion to Seal should be heard with the Motions to Dismiss and related filings.

2. State the hearing dates requested: The Debtor respectfully requests that the Court hear the Motion to Seal on June 27, 2023, or on a date and time which is most convenient for the Court.

4. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1). The applicant requests entry of the proposed order shortening time.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Motion to Seal.

Dated: June 26, 2023

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

Paul R. DeFilippo, Esq.

James N. Lawlor, Esq.

Joseph F. Pacelli, Esq. (Admitted *pro hac vice*)

500 Fifth Avenue

New York, New York 10110

Telephone: (212) 382-3300

Facsimile: (212) 382-0050

pdefilippo@wmd-law.com

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